IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

PAMELA G. CAPPETTA,)
Plaintiff,)
v.) Civil Action No. 3:08-cv-00288
GC SERVICES LIMITED PARTNERSHIP,)
Defendant.)

MOTION FOR A PROTECTIVE OPRDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendant GC Services Limited Partnership ("Defendant"), by counsel, hereby moves this Court for a protective order quashing Plaintiff's Notice of Deposition to Terri Paurich dated November 13, 2008. For the reasons set forth in the accompanying Memorandum, Defendant respectfully requests the Court enter a protective order and award such other and further relief as the Court deems just and proper.

Pursuant to Local Rule 37(E), the undersigned hereby certifies that counsel for Defendant has in good faith conferred with counsel for Plaintiff in an effort to resolve this dispute without court action.

Respectfully submitted,

G.C. SERVICES LIMITED PARTNERSHIP

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2008, I electronically filed the foregoing Motion For a Protective Order with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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/c/

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